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6 Attorneys for Plaintiff
United States of America
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8 IN THE UNITED STATES DISTRICT COURT
9
EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 GARY STEPHEN MAYNARD,

15 Defendant.

CASE NO. 2:21-cr-0224 TLN

18 U.S.C. § 844(f)(1) – Arson to Federal Property (4 counts); 18 U.S.C. § 1855 – Set Timber Afire (1 count); 18 USC § 982(a)(2)(B) – Criminal Forfeiture

18 I N D I C T M E N T

19 COUNT ONE: [18 U.S.C. § 844(f)(1) – Arson to Federal Property]

20 The Grand Jury charges: T H A T

21 GARY STEPHEN MAYNARD,

22 defendant herein, on or about July 20, 2021 (Cascade Fire), in Siskiyou County, State and Eastern
23 District of California, maliciously damaged and destroyed, and attempted to damage and destroy, by
24 means of fire personal and real property in whole or in part owned, possessed by, and leased to the
25 United States, in violation of Title 18, United States Code, Section 844(f)(1).

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FILED

Nov 18, 2021

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

COUNT TWO: [18 U.S.C. § 844(f)(1) – Arson to Federal Property]

The Grand Jury further charges: T H A T

GARY STEPHEN MAYNARD,

defendant herein, on or about July 21, 2021 (Everitt Fire), in Siskiyou County, State and Eastern District of California, maliciously damaged and destroyed, and attempted to damage and destroy, by means of fire personal and real property in whole or in part owned, possessed by, and leased to the United States, in violation of Title 18, United States Code, Section 844(f)(1).

COUNT THREE: [18 U.S.C. § 844(f)(1) – Arson to Federal Property]

The Grand Jury further charges: T H A T

GARY STEPHEN MAYNARD,

defendant herein, on or about August 7, 2021 (Ranch Fire), in Lassen County, State and Eastern District of California, maliciously damaged and destroyed, and attempted to damage and destroy, by means of fire personal and real property in whole or in part owned, possessed by, and leased to the United States, in violation of Title 18, United States Code, Section 844(f)(1).

COUNT FOUR: [18 U.S.C. § 844(f)(1) – Arson to Federal Property]

The Grand Jury further charges: T H A T

GARY STEPHEN MAYNARD,

defendant herein, on or about August 7, 2021 (Conard Fire), in Lassen County, State and Eastern District of California, maliciously damaged and destroyed, and attempted to damage and destroy, by means of fire personal and real property in whole or in part owned, possessed by, and leased to the United States, in violation of Title 18, United States Code, Section 844(f)(1).

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1 COUNT FIVE: [18 U.S.C. § 1855 – Set Timber Afire]

2 The Grand Jury further charges: T H A T

3 GARY STEPHEN MAYNARD,

4 defendant herein, on or about August 7, 2021 (Ranch Fire), in Lassen County, State and Eastern District
5 of California, did willfully and without authority set on fire timber, underbrush, and grass and other
6 inflammable material upon the public domain and upon lands owned and leased and under the partial,
7 concurrent and exclusive jurisdiction of the United States, in violation of Title 18, United States Code,
8 Section 1855.

9 FORFEITURE ALLEGATION: [18 USC § 982(a)(2)(B) – Criminal Forfeiture]

10 1. Upon conviction of one or more of the offenses alleged in Counts One through Four of
11 this Indictment, defendant GARY STEPHEN MAYNARD shall forfeit to the United States, pursuant to
12 18 U.S.C. § 982(a)(2)(B), any property constituting or derived from proceeds obtained, directly or
13 indirectly, as a result of such violations, including but not limited to the following:

14 a. A sum of money equal to the amount of proceeds traceable to such offenses, for
15 which defendant is convicted.

16 2. If any property subject to forfeiture, as a result of the offenses alleged in Counts One
17 through Four of this Indictment, for which defendant is convicted:

18 a. cannot be located upon the exercise of due diligence;
19 b. has been transferred or sold to, or deposited with, a third party;
20 c. has been placed beyond the jurisdiction of the court;
21 d. has been substantially diminished in value; or
22 e. has been commingled with other property which cannot be divided without difficulty;

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1 it is the intent of the United States, pursuant to 18 U.S.C. § 982(b)(1), incorporating 21 U.S.C. § 853(p),
2 to seek forfeiture of any other property of defendant, up to the value of the property subject to forfeiture.
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4 A TRUE BILL.
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6 **/s/ Signature on file w/AUSA**
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11 PHILLIP A. TALBERT
12 Acting United States Attorney
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No. _____

2:21-cr-0224 TLN

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

GARY STEPHEN MAYNARD

I N D I C T M E N T

VIOLATION(S): 18 U.S.C. § 844(f)(1) – Arson to Federal Property (4 counts);
18 U.S.C. § 1855 Set Timber Afire (1 count); 18 U.S.C. § 982(a)(2)(B) – Criminal forfeiture

A true bill,

/s/ Signature on file w/AUSA

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Foreman.*

Filed in open court this _____ 18th day

of _____ November _____, A.D. 20 21

*-----
/s/ N. Cannarozzi
Clerk*

Bail, \$ No process necessary.

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Jeremy Peterson*
JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE

United States v. Gary Stephen Maynard
Penalties for Indictment

COUNTS 1-4:

VIOLATION: 18 U.S.C. § 844(f)(1) – Arson to Federal Property

PENALTIES: At least 5 years and up to 20 years imprisonment,
\$250,000 fine,
Up to 3 years supervised release,
Restitution

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 5:

VIOLATION: 18 U.S.C. § 1855 – Set Timber Afire

PENALTIES: Up to 5 years,
\$250,000 fine,
Up to 3 years supervised release,
Restitution

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION:

VIOLATION: 18 U.S.C. § 982(a)(2)(B) – Criminal Forfeiture

PENALTIES: As stated in the charging document